

BEFORE THE FEDERAL ELECTION COMMISSION

JUN 9 1 26 PM '99

In the Matter of )  
 )  
Dole/Kemp '96, Inc., and Robert J. )  
Lighthizer, as treasurer )  
Dole/Kemp '96 Compliance Committee, )  
Inc., and Robert J. Lighthizer, as treasurer )

Audit Referral #99-09

**SENSITIVE**

**GENERAL COUNSEL'S REPORT**

**I. BACKGROUND**

On June 15, 1999, the Audit Division referred several matters to the Office of General Counsel arising out of the audits of Dole/Kemp '96, Inc. and the Dole/Kemp '96 Compliance Committee, Inc. The first finding addresses the extension of credit by US Airways.

The Office of General Counsel recommends that the Commission sever from Audit Referral #99-09 the matters relating to US Airways, open a separate Audit Referral, and place the severed finding under a new Audit Referral number. The new Audit Referral will be activated and assigned to staff.

## II. RECOMMENDATIONS

1. Open two new Audit Referrals.
2. Sever from Audit Referral #99-09 the issues related to US Airways and place under a new Audit Referral number.
- 3.

Lawrence M. Noble  
General Counsel

9/6/99  
Date

BY: Kim Bright-Coleman by GRS  
Kim Bright-Coleman  
Associate General Counsel